

EXHIBIT “J”

1
2
3 UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

4 -----X
ALEX HOLMES, et al.,

5 Plaintiffs,

6 -against- Case No.: 1:20-CV-04448-UA

7 CHET MINING CO., LLC, et al.,

8 Defendants.

9 -----X
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

10 -----X
ANDREW SCHWARTZBERG,

11 Plaintiff,

12 -against- Case No.: 1:20-CV-01880

13 CHET MINING CO., LLC, et al.,

14 Defendants.

15 -----X

16 **DEPOSITION** in the above-entitled actions,
17 taken before Susan Florio, a Registered
Professional Reporter and Notary Public in and for
18 the State of New York by Zoom.

19 WITNESS: **CHET STOJANOVICH**, DEFENDANT

20 PURSUANT TO: Subpoena

21 DATE: June 23, 2021

22 TIME: 1:00 p.m.-4:30 p.m.

23 HELD: Videoconference (Zoom)

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3 APPEARANCES:

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14 ALSO PRESENT:

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CHET STOJANOVICH,
having been first duly sworn remotely by the
notary public, was examined and testified as
follows:

BY MR. HARWICK:

Q. Mr. Stojanovich, as you know, my name is
John Harwick and I represent Alex Holmes and a
bunch of other judgment creditors who obtained
default judgments against you in a federal court
action and we've subpoenaed you for a collection
deposition today. I note, for the record, that
the deposition has been adjourned a few times and
this was the final adjourned date so I appreciate
you appearing on today's date.

Did you receive a copy of our subpoena
that we had served on you?

A. No. I didn't.

Q. Okay. Well, what's your e-mail? I'm
going to e-mail a copy of it to you right now.
Do you have access to e-mail?

A. I have access to e-mail. Yeah. Go

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 ahead.

3 Q. Well, if you didn't get --

4 A. I know you made requests for --

5 Q. Yeah. Chet, let me give you some
6 instructions for today's deposition. This is my
7 deposition. All right? So, I'm going to be
8 looking for answers to specific questions that
9 I'm asking you. So, I don't need lengthy
10 colloquies from you. I just need answers to the
11 questions I'm asking. Okay?

12 A. All right.

13 Q. So, some of these will be yes, no. If
14 you don't know, tell me. You know, this is
15 testimony under oath. It can be submitted to any
16 assigned judge, federal or state court judge
17 that's assigned to this case for any further
18 proceedings so it's important you tell the truth.
19 And I'm going to ask you again. Did you get a
20 copy of the subpoena that required your
21 attendance at a deposition?

22 A. To the best of my knowledge I don't know
23 if I got it, but I'm -- if you are asking me, I

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 really don't know. I --

3 Q. You don't know. Okay. So, the answer
4 would be "I don't know." But you are here today
5 pursuant to a subpoena. Is that correct?

6 A. To the best of my knowledge. I got the
7 request to come here to -- from the e-mail.

8 Q. Right. And you got the list of documents
9 that you were supposed to produce today, because
10 you've been sending me?

11 A. To the best of my ability. A lot of
12 those items don't apply to me --

13 Q. Right. The other instruction I can give
14 you, Chet, which is going to make this go faster,
15 which is I'm sure something you want, is just
16 wait until I'm done talking before you start
17 talking because Sue has to take everything we
18 both say down. Okay? All right?

19 A. All right.

20 Q. I'd like for you to state your name and
21 address for the record, please.

22 A. My name is Chet Stojanovich.

23 Q. Is your legal name Chester James --

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 A. No.

3 Q. -- Stojanovich?

4 A. It's Chet.

5 Q. Your legal name is Chet?

6 A. Yeah.

7 Q. Okay. And what's your current address?

8 A. 105 Duane Street, New York, New York

9 10007.

10 Q. Do you lease that apartment?

11 A. No. It's a rental.

12 Q. Okay. How much is your rent?

13 A. I have to check. I don't know.

14 Q. Approximately how much is your rent?

15 A. Well, we're in negotiations over it, so I
16 don't actually know what the figure is.

17 Q. Is your rent approximately 6- to \$7,000
18 per month?

19 A. That's where it started, yeah, and then
20 they dropped it during COVID because we got stuck
21 here.

22 Q. Is your date of birth 9/18/1984?

23 A. That's correct.

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 Q. Is your Social Security number
3 615-32-1735?

4 A. That's correct.

5 Q. Okay. Is your brother's name Paul?

6 A. My brother's name is Paul.

7 Q. Is your uncle's name David?

8 A. I have an uncle named David.

9 Q. And your mother's name is Sue or Susan?

10 A. My mother's name is Suzanne.

11 Q. Suzanne. Where does Suzanne live?

12 A. Suzanne lives in California.

13 Q. Do you know her address?

14 A. I don't have her physical address.

15 Q. Okay. Is her last name Nelson?

16 A. No.

17 Q. Does she live at 1606 Esplanade?

18 A. I don't know the address.

19 Q. Okay. Who's Tim LoBello?

20 A. He's my mom's cousin, I think.

21 Q. And what about Robert Ballantyne?

22 A. My dad's brother-in-law.

23 Q. Was he also a trustee for a trust that

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 you were a beneficiary of?

3 A. I don't know how it was specifically
4 Singer and Burke Capital Management structured,
5 so I can't really speak to that.

6 Q. Were you a beneficiary in a trust set up
7 by someone on your behalf?

8 A. I was for a period of time.

9 Q. Was there a payout at some period of
10 time, a lump sum?

11 A. No. It just was depleted?

12 Q. When was it depleted?

13 A. I don't know the exact date, but a few
14 years ago.

15 Q. Now, you got the Exhibit A, the document
16 of lists of things that you were supposed to
17 produce. That's why you sent me some bank
18 account records. Is that correct?

19 A. I sent you the bank account records that
20 I have.

21 Q. And you sent me some information you have
22 on your lease; is that correct?

23 A. Yeah. That was my original signed

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 agreement with my lease. The lease is up.

3 Q. Is the landlord trying to evict you?

4 A. I honestly don't know what to make of the
5 landlord. They've tried a lot of strange things
6 here.

7 Q. Has the landlord commenced a proceeding
8 to evict you from the apartment or to collect
9 background?

10 A. I think he's trying to get some back rent
11 right now, but I don't know if he's going to
12 settle. It's a complicated thing. It's
13 difficult dealing with my landlord because they
14 don't know the New York State laws.

15 Q. Do you have the contact information for
16 your landlord?

17 A. I don't. They call me from Greece.

18 Q. Do you know the name of your landlord?

19 A. It's Blueground Company.

20 Q. All right. Who lives with you at that
21 apartment?

22 A. I live here with my girlfriend.

23 Q. What's her name?

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 A. Tamsin.

3 Q. I'm sorry?

4 A. Tamsin.

5 Q. Can you spell that?

6 A. T-a-m-s-i-n.

7 Q. What's her last name?

8 A. Measroch.

9 Q. Can you spell that?

10 A. M-e-a-s-r-o-c-h.

11 Q. How old is she?

12 A. She's 31.

13 Q. What does she do for a living?

14 A. She works in the healthcare field, but
15 she's not working right now because of health
16 reasons.

17 Q. Does she pay rent or do you pay rent?

18 A. Right now we are trying to sort that out.
19 She doesn't. She, nor I are paying rent right
20 now so.

21 Q. Do you have a bank account right now at
22 Capital One?

23 A. That's correct.

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 Q. In fact, you sent me --

3 A. Three months I had a bank account there.

4 Q. Three months you've had a bank account
5 there. What is the source of the funds in that
6 account?

7 A. Some of it was savings. Right now it's
8 cash savings.

9 Q. Do you have any other accounts?

10 A. The ones I sent over to you were the
11 previous accounts that I had that you requested.
12 Those accounts are no longer open.

13 This is my primary active account. I
14 have -- I may have another account. I'm not
15 sure. I have to look, over at Robinhood, but
16 it's been a long time since I've used that now.

17 Q. What's Robinhood?

18 A. It's like an investment app or like an
19 investment account where you have trade free, you
20 can trade stocks for free.

21 Q. Do you own stocks or bonds?

22 A. I don't know what I have in Robinhood.
23 I'd have to go through the app.

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 Q. All right. Is your phone fired up yet?

3 A. I'm still waiting for it to connect.

4 There's no connectivity right now.

5 MR. HARWICK: Okay. Well, we'd
6 request the account information, account
7 statements for the Robinhood account,
8 which was part of Exhibit A that we sent
9 you.

10

11 *COUNSEL REQUESTS INFORMATION TO BE SUPPLIED*

12

13 THE WITNESS: Yeah. I don't know
14 if I have a functional Robinhood account,
15 if it's open or not. I haven't been able
16 to access it in some time.

17 MR. HARWICK: All right. Sue, I
18 want to note for the record I have Nico
19 and Lars, I think are also listening in
20 as they are entitled to, to Article 52
21 collection deposition.

22 THE WITNESS: Yeah. I don't think
23 I have any of those.

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 Q. What are your sources of income?

3 A. My source of income usually is from doing
4 business like self-employed.

5 Q. Okay. So, who does your tax returns?

6 A. I just got a new CPA that's helping me
7 out and I have to look up his name.

8 Q. Okay. Go ahead and take a look for his
9 name. I'll wait.

10 A. I don't know them. Hang on a second.
11 Let me find it. I think it's Michael Goldfine.

12 Q. Okay. Do you have his contact in your
13 phone?

14 A. You'll have to give me a second.

15 Q. Sure. Go ahead.

16 A. This is the best of my knowledge. I've
17 only met the guy once and there wasn't much to
18 report during COVID.

19 Q. Are you looking?

20 A. Yeah. I am. I'm trying to find the
21 details. I found an address of 40 Exchange
22 Place, Suite 1602.

23 Q. Can you spell his last name?

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 A. Goldfine, G-o-l-d-f-i-n-e.

3 Q. And who did you use before that?

4 A. I used -- this was Icon. Icon Business
5 Management and her name was Sally.

6 Q. Can you spell that name?

7 A. Icon? I-k-o-n (sic) I believe.

8 Q. Where are they located?

9 A. I think they are out of Century City in
10 Los Angeles.

11 Q. Do you have a contact for them, number?

12 A. Sally. I have to check my e-mail. Hold
13 on.

14 Q. What are your sources of income now?
15 When was the last time you earned money and where
16 did it come from?

17 A. Like I said before, it was -- it's Sally,
18 if you want me to answer the previous question.

19 Q. Sure.

20 A. Sally Velazquez, V-e-l-a-z-q-u-e-z.

21 Q. And what about a phone number or e-mail
22 or address?

23 A. Sally@icon-bm.com.

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 Q. What does that business do for you?

3 A. Tax filings.

4 Q. Do you owe the IRS money?

5 A. Not to my knowledge.

6 Q. Okay. When was the last time -- did you
7 have to pay quarterlies at all last year?

8 A. Not to my knowledge.

9 Q. You know what quarterlies are, right?

10 A. Yeah.

11 Q. Had you ever had to pay quarterlies?

12 A. Honestly, my taxes were very, very
13 complicated so I can't really speak to how they
14 are paid. I mean, someone else always sends my
15 taxes.

16 Q. Do you have copies of your tax returns?

17 A. What?

18 Q. Do you have copies of your tax returns?

19 A. I don't.

20 Q. All right. Have you ever been married,
21 Chet?

22 A. No.

23 Q. Do you have any children?

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 A. No.

3 Q. Okay.

4 A. Not to the best of my knowledge. I hope
5 I don't.

6 Q. Have you made any loans to other people?

7 A. Can you clarify a little bit? What do
8 you mean by that?

9 Q. Have you loaned anybody money within the
10 last six years?

11 A. No. Nothing like substantial, not like a
12 formalized loan agreement, but I loaned to a
13 friend here or there over the last six years.

14 Q. Who have you loaned money to, how much,
15 and when?

16 A. I'm just saying in the last six years at
17 some point in time I probably let somebody borrow
18 money, but nothing like formalized, like 20 bucks
19 here, 100 bucks there, whatever.

20 Q. Do you own any certificates of deposit?

21 A. What?

22 Q. Do you own any certificates of deposit,
23 CDs within the last six years?

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 A. I don't.

3 Q. All these questions relate to the last
4 six years. Okay?

5 A. All right. I don't know all the -- these
6 kinds of answers because I never set up these
7 kinds of things.

8 Q. Have you ever filed for bankruptcy?

9 A. Unh-unh.

10 Q. You've got to say yes or no.

11 A. No.

12 Q. Does anybody owe you money?

13 A. Not directly.

14 Q. What do you mean by that?

15 A. Chet Mining Co. for services not
16 rendered, which we are trying to get that.

17 Q. How are you trying to get that money?

18 A. The company is out the Canada that owes
19 the money and they filed Chapter 11, but we also
20 paid the individual owners, so we are trying to
21 pursue that how we can because they owe us quite
22 a bit of services.

23 Q. What's the name of the company?

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 A. Great North Data.

3 Q. Did they file bankruptcy in Canada?

4 A. They did. To the best of my knowledge.

5 I don't understand bankruptcy so I don't know how
6 to explain it.

7 Q. Who are the individual owners that you
8 think are liable for that debt?

9 A. I know that it's James Goodwin, is one of
10 them, but I have to go through the list of
11 people. I know that there's six partners there.

12 Q. What list would you look at?

13 A. What?

14 Q. You said you'd have to look at the list.
15 What list?

16 A. I'd have to look at the list of contacts
17 at Great North Data. I don't want to speak to
18 who's on the partners list.

19 Q. What transaction did you have with Great
20 North Data that gave rise to a debt owing?

21 A. We had a few transactions where we paid a
22 few hundred thousand dollars for services and
23 they never rendered those services.

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 Q. Did you commence a lawsuit?

3 A. I haven't commenced a lawsuit.

4 Q. Did you commence a lawsuit with regard to
5 that transaction, you or your companies?

6 A. No. We haven't commenced a lawsuit yet.
7 We are trying to work this out.

8 Q. Do you have a lawyer for that matter?

9 A. I've been talking to lawyers, but it's
10 hard to find somebody that's in Labrador.

11 Q. Now, are you the sole owner of Chet
12 Mining Co., LLC?

13 A. Yes. I believe so.

14 Q. Are you the sole owner of Chet Mining Co
15 Canada, LTD?

16 A. I have no idea about LTDs. I know that
17 we tried to file some of these LTDs, some of them
18 went through and some didn't. So, I have been
19 trying to get to the bottom of that.

20 Q. What company do you own an interest in?

21 A. Chet Mining Co., LLC.

22 Q. Anything else?

23 A. I have a couple others, but I have to

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 look to see if we still have those open or if
3 they are closed.

4 Q. Within the last six years I want you to
5 list the companies you had an ownership interest
6 in.

7 A. There was CSD and Accelerant Media in the
8 last six years, I believe. And that's Chet
9 Stojanovich Distributions and we had productions,
10 and Accelerant Media were the three that I had
11 filed.

12 Q. And what jurisdictions were those filed
13 in? Why don't you go through again and list them
14 and tell me each jurisdiction.

15 A. I think they were all Delaware Corps that
16 were operated out of New York.

17 Q. Are they still in business?

18 A. No.

19 Q. Do they have any assets?

20 A. Not to my knowledge. All the accounts
21 have been shut down.

22 Q. Did you used to have a banking account at
23 Chase Bank as well?

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 A. I did.

3 Q. When did that close?

4 A. I don't know the exact date, but it was
5 2019, is when my Chase accounts were closed.

6 Q. Have you ever had a financial statement
7 prepared, ever?

8 A. I'm sure that I had one prepared at some
9 point in time in the last 20 years, but I don't
10 have documentation. During the relocation that I
11 had I lost most of my paper copies where I keep
12 most of my stuff, the hard copies.

13 Q. Well, do you have electronic copies?

14 A. I can check to see if there's any
15 electronic copies.

16 Q. Well, the subpoena that we served on you
17 required you to produce financial statements and
18 so we need you to search for your financial
19 statements, whether paper or electronic, or if
20 you have access to them by contacting an
21 accountant that can get those to you, you have to
22 get those to me.

23 A. Yeah. Unfortunately I'm new to this

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 accountant. My other accountant was supposed to
3 transfer over. I don't know if he passed away or
4 the circumstances, but he was somebody that I
5 couldn't reach that was passed over from Sally to
6 help me with my taxes. I don't know if he passed
7 away or what the circumstances were, but he
8 basically disappeared. With that I don't know if
9 the business was shut down. I've done a lot to
10 get ahold of him, but I really don't know what it
11 was.

12 Q. Okay. Do you own any real property?
13 Have you owned any real property within the last
14 six years?

15 A. Can you explain what you mean by real
16 property?

17 Q. You've got to speak up.

18 A. Can you explain what you mean by real
19 property?

20 Q. Real estate, land, buildings.

21 A. No. I don't have any land holdings if
22 that's what you are asking. I don't own any
23 land. And I don't own any real estate.

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 Q. Do you own any interest in other business
3 entities other than those you already talked
4 about or any partnerships, LLCs, corporations,
5 LTDs, anything like that?

6 A. I would have to look to see if I have any
7 interest in any other companies.

8 Q. What would you have to look at?

9 A. I would have to look at my e-mails
10 because I don't typically file that stuff. So,
11 I'd have to look to see if they created a
12 company. For a period of time I had a business
13 manager firm that did a lot of filings without
14 notifying me. So, I have no idea what they did
15 on my behalf.

16 Q. What was the name of that company?

17 A. Singer Burke Capital.

18 Q. You've got to speak up.

19 A. Singer Burke Capital Management.

20 Q. Can you spell that for the stenographer?

21 A. S-i-n-g-e-r B-u-r-k-e Capital Management.

22 Q. And where are they located?

23 A. Encino, California.

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 Q. Where do you hold driver's licenses?

3 A. I only have a driver's license in New
4 York.

5 Q. Did you ever have one in Washington?

6 A. Not to my knowledge. I didn't have one
7 in Washington. I think I had one in Oregon for a
8 while. That's where I learned to drive, where I
9 got my first driver's license.

10 Q. Okay.

11 A. But not Washington.

12 Q. In Portland, Oregon?

13 A. Yeah.

14 Q. So, I'm just curious. The name that
15 appears on the birth certificate, is it Chester
16 or is it Chet?

17 A. Chet, C-h-e-t.

18 Q. Okay. What was your father's name?

19 A. Paul.

20 Q. Did he pass away?

21 A. Yeah. He passed away.

22 Q. When?

23 A. 2003.

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 Q. Did he leave you an inheritance?

3 A. He did leave a trust behind that we
4 talked about before.

5 Q. How much money was in the trust?

6 A. I don't know. I honestly don't know to
7 this day.

8 Q. How much did you get out of the trust?

9 A. I really don't know to this day. It's
10 been a difficult thing. Trusts rarely are
11 handled properly from my -- and they are usually
12 very difficult things to deal with.

13 Q. Is the trust open or closed to your
14 knowledge?

15 A. To the best of my knowledge it's closed.

16 Q. What was the name of the trust?

17 A. I honestly don't know what they refiled
18 it to. I think it was called the Paul Stojanovich
19 Trust 2000.

20 Q. Okay.

21 A. But it's --

22 Q. You answered my question.

23 A. This is an area that's always a gray area

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 when it comes for me. It's -- so, if I can
3 answer it better just let me know. I just don't
4 know.

5 Q. Yeah. No. Shorter answers are better.

6 Do you own a business by the name of Chet
7 Stojanovich Productions, LLC?

8 A. Yeah. That's what I was just -- I was
9 listing before. Chet Stojanovich Productions.

10 Q. Is that in business or out of business?

11 A. Yeah.

12 Q. In business or out of business?

13 A. Out of business.

14 Q. How about Chet Stojanovich Distributions,
15 LLC?

16 A. That's out of business, too.

17 Q. What about Port Chester Productions, LLC?

18 A. I -- see that's exactly kind of what I'm
19 bringing up. I don't know. That could have been
20 filed on my behalf.

21 Q. What about the World Humanitarian
22 Organization, Inc.?

23 A. That was a long time ago. That was

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 supposed to be a -- we did some humanitarian work
3 in Africa.

4 Q. What about Lightning Assassin Corp.?

5 A. I have no idea.

6 Q. Do you have a security deposit on file
7 with your landlord?

8 A. I did. My landlord is intent on keeping
9 it.

10 Q. How much is that deposit?

11 A. I think it was 10,000 or something like
12 that, or 7,000. It's right in that range. I
13 made two different deposits.

14 Q. Has your landlord commenced an action
15 against you in the New York State Supreme Court
16 for the County of New York for any reason?

17 A. I don't know. They may have. They are
18 very difficult to deal with apparently.

19 Q. You don't know if they have or not?

20 A. I don't know if they have or not. They
21 said they weren't going to, but I don't trust
22 what they say so.

23 Q. Do any other entities or individuals have

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 judgments against you?

3 A. Not to my knowledge. Outside of what we
4 discussed.

5 Q. What about an entity called Tribeca
6 Green, LLC?

7 A. That's a different entity. That was one
8 of my old landlords.

9 Q. Did they file a judgment against you for
10 \$8,106?

11 A. Perhaps. I'm sure that's paid off. I
12 don't know why they would file any judgment.

13 Q. Did they evict you from 325 N. End
14 Avenue, Apartment 3H?

15 A. They tried to I think. They tried to
16 take me to court. It's a common now they want to
17 clear people out that were there for a long time.

18 Q. Were any of your other business entities
19 sued for anything?

20 A. What?

21 Q. Were any of your other business entities
22 sued for anything?

23 A. Not to my knowledge.

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 Q. Okay. Do you own any aircraft?

3 A. No.

4 Q. Boats?

5 A. No.

6 Q. Vehicles?

7 A. My car I had last year got stolen so.

8 Q. What kind of car was it?

9 A. GMC Yukon.

10 Q. And where did it get stolen?

11 A. In Buffalo, like in that area.

12 Q. Did you own that vehicle?

13 A. I did. I paid cash for it.

14 Q. Did you report that to the police?

15 A. I did.

16 Q. And what police department?

17 A. The Niagara and Buffalo police.

18 Q. Did you get an insurance settlement
19 because of that?

20 A. No. I didn't. Still fighting the
21 insurance company.

22 Q. I'm sorry?

23 A. I'm still fighting with the insurance

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 company on that.

3 Q. What's the name of the insurance company?

4 A. Progressive.

5 Q. Is that in your name?

6 A. Yes.

7 Q. Do you know the policy number?

8 A. I think I sent it over to you, but give
9 me a moment.

10 Q. Why don't you get me the policy number on
11 that.

12 A. Yes. Just give me a moment and I'll give
13 you the policy number. It's 935153574.

14 Q. One more time so we have it.

15 A. 935153574.

16 Q. Who's the claim adjuster handling the
17 claim?

18 A. I think her name was Heather.

19 Q. I'm sorry. Can you say that again?

20 A. I think her name was Heather.

21 Q. Do you have a phone number for her?

22 A. You'll have to give me a moment.

23 Q. Sure.

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 A. I just have the Progressive phone number,
3 the 800 number.

4 Q. Go ahead.

5 A. (800) 776-4737.

6 Q. Have you ever been audited?

7 A. 5 -- sorry?

8 Q. Go ahead. What were you saying?

9 A. (855) 347-3949.

10 Q. Have you ever been audited?

11 A. Not to my knowledge.

12 Q. Do you receive a paycheck from any
13 regular source?

14 A. Not regular.

15 Q. How much money do you have in the bank
16 total today?

17 A. My account balance right now is a few
18 thousand. I don't know the exact balance without
19 logging in.

20 Q. Do you have any credit cards?

21 A. My credit cards were closed. I have to
22 see if one of them is still open, but that's one
23 of those things I'm not certain about.

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 Q. Where do you have credit cards, what
3 banks or institutions?

4 A. Chase. The ones I sent over to you.

5 Q. Do you have --

6 A. And I had the American Express as well.

7 Q. Okay. You have an AmEx. Do you know the
8 number for AmEx?

9 A. No. I don't. It's been a long time.
10 It's been closed for a while.

11 Q. Do you have a will?

12 A. I have a will, I think. I have to find
13 it but it needs to be updated.

14 Q. Who's in the will?

15 A. Just family, I guess. Family, and I
16 think just has my wishes and stuff like that.

17 MR. HARWICK: We'll request a copy
18 of your will. I'm going to send you
19 Exhibit A again.

20
21 *COUNSEL REQUESTS INFORMATION TO BE SUPPLIED*

22
23 THE WITNESS: Let me see if I can

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 find it. I don't know if I have a copy
3 of it. That's the issue.

4 Q. Do you have a safety deposit box?

5 A. No. I don't.

6 Q. Do you have a safe?

7 A. No.

8 Q. Do you have any retirement accounts,
9 401k?

10 A. No.

11 Q. 403? All right. Do you have any stock
12 options?

13 A. We went over that before. I don't know
14 what I have and I -- to the best of my knowledge
15 I don't have anything right now.

16 Q. What about commodity accounts, do you own
17 any commodity accounts?

18 A. No. Not that I know of. That's a hard
19 thing for me to tell, but I don't trade in
20 commodities other than a case by case basis.

21 Q. Have you made any loan applications or
22 credit card applications within the last six
23 years?

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 A. I'm sure I have, but I'd have to check my
3 credit to see what that is.

4 Q. Have you run your credit report?

5 A. I haven't recently.

6 Q. All right. Do you know you can get your
7 free credit report every year?

8 A. Yeah.

9 MR. HARWICK: I'm going to ask you
10 to run your credit report and send it to
11 me.

12

13 *COUNSEL REQUESTS INFORMATION TO BE SUPPLIED*

14

15 Q. Do you have any mortgages?

16 A. No mortgages because I don't have any
17 real estate.

18 Q. Did you ever do a statement of net worth?

19 A. No. I have never done that.

20 Q. Are you a party to any other lawsuits
21 other than the ones we are here to talk about
22 today?

23 A. To the best of my knowledge I think

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 there's only one other lawsuit that I've had to
3 deal with.

4 Q. What's that?

5 A. That was with JP Barrett Minor Stores, or
6 something, or I forgot what the actual business
7 entity is.

8 Q. Have you ever met an attorney named
9 Edward Williams or Trocan Williams?

10 A. I'm really bad with names so I have no
11 idea. I don't know.

12 Q. Have you ever met an attorney that deals
13 with cryptocurrency named Williams, an African-
14 American maybe in his 30s?

15 A. It's not striking a bell. I may have. I
16 don't know. I've dealt with attorneys.

17 Q. How about a dealer of crypto mining
18 equipment named Hash Deploy or Doug Shook, had
19 you ever met him in New York City?

20 A. I met Doug before.

21 Q. How do you know Doug?

22 A. Doug reached out to me a few years back
23 and I got to meet -- I met him, I guess, just

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 through a phone call.

3 Q. All right. Was it business or?

4 A. Yeah. We were in the same kind of
5 business and he had reached out to me to do
6 business at Hash Deploy and I was doing business
7 over at my business.

8 Q. Did he discuss with you another crypto
9 dealer named Michael Miranda or Northway Mining
10 or anything like that? Do you remember that?

11 A. He complained about the guy a lot.

12 Q. I'm sorry. I didn't --

13 A. He complained about the guy a lot. The
14 guy threatened him a lot from what he told me.

15 Q. Okay.

16 A. I guess he was a pretty scary guy.

17 Q. Did you facilitate the transfer of some
18 money from Doug Shook to a third party?

19 A. I can't really speak to that. I don't
20 know what went on with Michael Miranda so.

21 Q. Well, if Doug Shook gave a federal
22 deposition in a case and claimed that you had
23 taken some money that Michael Miranda paid him

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 and then kept that money would he be lying?

3 A. If I took the money and kept the money?

4 Q. Yeah.

5 A. For like? Can you be specific on it,
6 like kept the money for myself?

7 Q. Kept the money or had it transferred to a
8 third party?

9 A. I honestly don't know. I mean, I helped
10 him out with a few things. I really don't know.
11 I helped him out over the years with a few
12 things, got him in touch with people. The mining
13 industry does a lot of forwarding stuff. So, we
14 forward one person to another person in the
15 resales market. So, that's the same. What I do
16 know is that that ended up being a very difficult
17 thing for Doug. I mean, put through a lot of
18 hell as a result of that.

19 Q. Well, if Doug Shook testified under oath
20 that he had a deal with Mike Miranda to sell
21 Miranda some equipment and you interjected and
22 claimed that Mike Miranda was essentially a crook
23 and Doug should take that money and give it to

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 someone named Daniel Kim at Mind Map, okay, would
3 that be something you recall?

4 A. I told him to not do business with
5 anybody that's -- are as a rule of thumb under
6 investigation with the FBI and that's what he
7 told me, he was under investigation with the FBI.
8 And that's where I just said to him, I go look,
9 you can't do business with people like that. I'm
10 not going to do business with people like that.
11 And he had a, I guess a long history of dodging
12 out. This is all -- all of it's rumor, some of
13 it is online. I don't know the specifics. I
14 don't talk to any of the officers.

15 Q. Did you instruct Douglas Shook or Hash
16 Deploy to take Mike Miranda's money and transfer
17 it either to yourself or to a company named Mind
18 Map or Serenity Alpha or their principals, Daniel
19 Kim being one of them?

20 A. I don't know who Daniel Kim is. That was
21 a long time ago. But I told him to return the
22 money -- I said if he does run into any money he
23 should do the right thing and send it back to the

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 people it was from, take the lawful steps and
3 make sure it's done properly and that's the
4 advice that I gave him.

5 Q. Did you receive any of that money?

6 A. I don't know. I don't know what was
7 what. I can't speak to that. Like I was saying
8 before, a lot of the stuff that would be
9 forwarded on to deals and Doug has brought, you
10 know, basically purchased stuff to -- Doug has
11 brought stuff to the table, where he's brought
12 like a purchase agreement deal and I'm not always
13 privy to who that is and I usually forward it on
14 or refer to someone else, when I don't know who
15 it is I'll refer him to somebody that can help
16 him out with those deals. I try not to get into
17 business with his clients so it's a complicated
18 thing. Because I don't know what deals were
19 involved with Miranda to this day and I don't
20 know what the deals were, but I do know that, you
21 know, Doug ended up getting stuck in a deal with
22 Miranda and I tried to stay as far away from it
23 as possible.

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 Q. Have you heard of an entity named
3 Serenity Alpha?

4 A. It sounds familiar. You said it three
5 times, but I don't know.

6 Q. What about Mind Map?

7 A. It sounds familiar, but all those
8 companies do. It's been a few years since I've
9 had talks with Doug about Mike Miranda or
10 anything else. I think the last time I talked to
11 Doug was about --

12 Q. Who is your cell service provider?

13 A. I have Verizon, I think.

14 Q. What's your phone number?

15 A. 824-3903.

16 Q. What kind of computers do you have? What
17 kind of computers do you own?

18 A. I have a Mac and a PC.

19 Q. Are those your computers?

20 A. They are my computers that I work on at
21 home so.

22 Q. Do you have a regular job? Do you go to
23 work or what do you do on a daily basis?

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 A. I'm self-employed.

3 Q. Doing what?

4 A. I'm just self-employed. I mean, I do
5 basically my own business within my own
6 structure.

7 Q. Yeah. What do you do?

8 A. Sales, retail sales is what we typically
9 do. We've been shut down for a while since COVID
10 and the retail has been shut down. We weren't
11 part of the essential service industry.

12 Q. Retail sales of what?

13 A. Computers, turnkey solutions, stuff like
14 that.

15 Q. What's the name of your business?

16 A. Chet Mining, LLC, is my business.

17 Q. Is that still your business?

18 A. It's still my business. I still own it.

19 Q. Where does Chet Mining, LLC, have its
20 bank account?

21 A. Its bank account has been closed so.

22 Q. Well, you are currently in business still
23 doing retail sales, correct?

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 A. No.

3 Q. All right. Well, how do you support
4 yourself?

5 A. When we got -- once we lost our account
6 last year they made it very difficult for us to
7 do business. So, that's been really challenging,
8 but during COVID because we were mandatorily
9 required to shut down in 2019. Well, 2020, we
10 got our account shut down. The bank shut down
11 around here. So, we weren't really able to
12 operate. And we tried to get an operating
13 location going and -- in the states because we
14 were in Canada before that, but the company ended
15 up just not being reliable and ended up having to
16 shut back down.

17 Q. Chet, here's my question. Right? You
18 are living in New York City in a relatively
19 expensive apartment. You have to eat and you
20 have to entertain yourself. How do you get money
21 to do that?

22 A. To entertain myself?

23 Q. Yeah.

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 A. I don't really do things to entertain
3 myself. I spend -- most of my time last year I
4 was sick. So, I don't like go out, party, or do
5 anything like you would normally think that I
6 would do.

7 Q. Does your girlfriend live with you in
8 your apartment?

9 A. She does live here.

10 Q. How long have you been together?

11 A. We've been together for, on and off for
12 about seven years now.

13 Q. Okay. And what are her current sources
14 of income, if any?

15 A. I don't really know. I mean, she's got
16 her savings, but I don't really know. I know
17 she's been sick and off work so. But I don't ask
18 her about that stuff.

19 Q. I'm going to put you on notice now that
20 we are going to take her deposition to see what
21 she knows about your personal assets.

22 A. Yeah. We just keep our stuff separate so
23 she doesn't really know.

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 Q. Well, I'll ask her that under oath. I'm
3 giving you notice that we are also going to
4 depose Robert Ballantyne. We are going to depose
5 John -- or Paul John Stojanovich, Luca
6 Schnetzler, S-c-h-n-e-t-z-l-e-r, Sue Elizabeth
7 Nelson.

8 A. Who's Sue Elizabeth Nelson?

9 Q. I believe that's your mother.
10 Tim LoBello and David Alan Kaiser. Who's
11 David Alan Kaiser again?

12 A. My mom's brother. But, yeah, I don't
13 know him very well.

14 Q. When was the last time you traveled
15 outside of New York City?

16 A. I don't know. It's been some time.
17 We've been locked down for the most part out
18 here. I haven't like flown anywhere for over a
19 year.

20 Q. All right. I'm going to ask you a few
21 questions. Remember you are under oath. Okay?
22 And if I find out that you are not being
23 truthful, I'm going to report you to the court.

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 A. I have done some driving but that's it.

3 Q. Did you hear what I just said, Chet?

4 A. Yeah.

5 Q. Okay. Do you own any cryptocurrency?

6 A. I have some miscellaneous wallets with
7 like a little bit of crypto I found recently, but
8 I liquidated most of that out.

9 I don't know if I have any wallets that
10 are sitting, but I know all of my wallets are
11 being shut down.

12 Q. All right. When you say you liquidated
13 it, when did you liquidate your cryptocurrency?

14 A. Sometime in the last few months.

15 Q. Okay.

16 A. I've been just trying to find whatever I
17 have in cryptocurrency from before.

18 Q. So, you liquidated your cryptocurrency in
19 the last few months. Is that correct?

20 A. Yeah. That's correct.

21 Q. Where were your cryptocurrency accounts
22 or wallets? Where was your cryptocurrency?

23 A. I had one at Gemini.

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 Q. Okay. And do you have an account number
3 associated with that or anything?

4 A. Gemini is not set up to have account
5 numbers. I don't think any of the exchanges are.

6 Q. Did you have an account at Coinbase?

7 A. I had a Coinbase account, but I got it
8 closed in September 2019.

9 Q. Where did that money go?

10 A. I'm still trying to figure that out to be
11 honest with you.

12 Q. What about Kraken, did you have one at
13 Kraken?

14 A. I have no idea. I think I tried to sign
15 up for most of the exchanges at one point in
16 time. But New York has different blog license
17 difficulties. So, if Kraken doesn't have a New
18 York blog license there's only ten to the best of
19 my knowledge. So, there were very few providers
20 that were able to sell cryptocurrency in the New
21 York area.

22 Q. How would I access your cryptocurrency
23 account data? Is that on your hard drive?

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 A. Honestly, I have no idea. I've got -- I
3 would love to get that information myself right
4 now but it's been difficult to do. And with all
5 the stuff with Coinbase going public with my old
6 accounts it's been even more difficult to pull up
7 that transaction history. I was able to download
8 some of it from 2019 today, but it was from -- it
9 was in my cloud that I found the transaction
10 history.

11 Q. Okay. Do you have that handy? Can you
12 e-mail that to me now, please?

13 A. Yeah. I'll send it over to you.

14 Q. All right. Why don't we take a short
15 break, stay online, and why don't you go e-mail
16 that crypto account information. Okay?

17 A. Yeah. You'll have to give me a little
18 bit of time to pull it all together so.

19 Q. Yeah. Well, we'll take a break. We'll
20 need to take a break anyway. So you can get that
21 together and send it to me by e-mail and then
22 we'll go back on the record. Okay?

23 A. All right. I'll try to put this together

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 on e-mail for you. I don't know how well-defined
3 it's going to be. It may be just Excel sheets.
4 I'll try to find a PDF but.

5 Q. Well, what do you have, a Gemini app or
6 something? How do you access your Gemini
7 account?

8 A. I think my Gemini account got shut down
9 recently. I can't get access to it so the only
10 way --

11 Q. Do you have a password and log-on
12 information stored somewhere obviously?

13 A. It's a two-factor system so if you can't
14 get through on the app, you have to use a
15 two-factor password which changes every six
16 seconds to log in. So, it's a little bit more
17 complicated than your typical log in for any
18 other kind of like investment account, like if
19 you were looking at like TD Ameritrade or
20 something like that. I don't know. Any kind of
21 investment banking that you go to it's not the
22 same log-in procedure where they use voice
23 identifiers, call online, something like that.

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 They don't actually do that stuff and at Gemini
3 or any of the other places. It's --

4 Q. Well, Chet, how do you pay your bills?

5 A. I pay my bills through my checking
6 account.

7 Q. Okay. And do you also have a debit card
8 on that account as well?

9 A. I believe I do. Yeah. I do.

10 Q. Okay. Did you file tax returns for 2020
11 yet?

12 A. No. That's in October. To the best of
13 my knowledge. Again, I don't handle my taxes so
14 I don't know. So, I don't know what they've done
15 so far, but to the best of my knowledge it's
16 supposed to be October 15th or something like
17 that so.

18 Q. All right. Why don't we take a short
19 break. Stay on the call, get together your
20 crypto.

21 A. Yeah. I'm going to see what I can do.

22 (Recess taken at 1:52 p.m.;

23 proceedings resumed at 2:15 p.m.)

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 MR. HARWICK: Back on the record.

3 Q. Chet, you are still under oath.

4 A. Yes. I understand that.

5 Q. All right. So, hang on for a second.

6 So, Chet, we just took a 20-minute break
7 from the record. We are back on the record. You
8 are still under oath.

9 You were kind enough to send me a
10 spreadsheet.

11 A. Yeah. It's what I found earlier today.
12 I found that earlier today.

13 Q. And that's an e-mail to me dated 6/23/21
14 at 2:13 p.m. with an attached Excel spreadsheet.
15 If you are looking at it can you just tell me
16 what it means and where you got this spreadsheet
17 from?

18 A. I found it on the cloud basically in my
19 storage, like a Google Drive kind of thing, and
20 it's just a document that I found that was
21 entitled 2019 or something.

22 Q. So, this is just your internal document;
23 is that right?

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 A. No. It's one that they issued to you,
3 because it looks like it has transactional data
4 on it so.

5 Q. What's the most amount of crypto you've
6 ever owned in US dollars?

7 A. I have no idea.

8 Q. More than a million dollars?

9 A. I honestly don't want to speculate on
10 that. I would have to look.

11 Q. More than ten thousand dollars?

12 A. I don't want to speculate on that. I'd
13 rather not --

14 Q. You've got to speak up.

15 A. I'd like to have a really good
16 understanding first before speaking to that. I
17 don't want to speculate. I can only answer like
18 what I know for sure and I have to look that up.
19 I don't know what. I want to check that.

20 Q. Where would you look it up?

21 A. I'd have to look up, I'd have to check
22 with a former accounting company is probably the
23 best place to start. If they don't have the

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 records, I'm going to have to go skim through
3 what I have and look in the cloud for additional
4 history.

5 Q. Okay. Do you have an iCloud account?

6 A. Probably.

7 Q. Well, you just said you found this on the
8 cloud today?

9 A. Yeah. It was Google Drive.

10 Q. Google Drive. Okay. What's your Google
11 password?

12 A. My password to my cloud?

13 Q. Yeah.

14 A. I don't know. It's saved in here. I can
15 look it up.

16 Q. Yeah. Go ahead and look it up.

17 A. I think it's happy dog, but I have to
18 double-check.

19 Q. You'll have to spell any names. And what
20 would be your ID?

21 A. I have to see.

22 Q. While you are looking that up what
23 e-mails do you use?

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 A. I've been using the Chet@ChetMiningCo.com
3 for communications.

4 Q. Do you have any other e-mails like a
5 Gmail or anything?

6 A. I have a bunch of old ones I don't use.

7 Q. What are your old ones?

8 A. I had a WWPV2012 a while back, but I had
9 a bunch of different e-mails that I used for
10 different kinds of, I guess, different kind of
11 purposes. Like if you have a Google Drive or
12 whatever you have like your personal versus your
13 professional and I always kept those two
14 separate.

15 Q. What did you think your password was?
16 Good dog you said.

17 A. Happy dog I think is what my password is.

18 Q. No. That's wrong. Why don't you look up
19 your Google? I assume your login is your e-mail,
20 right, Chet@ChetMiningCo.com?

21 A. No. It's not always linked that way.

22 Q. Well, give me your -- would it be under
23 your phone number do you think?

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 A. No. E-mails aren't set up that way, like
3 Google Drive and One Drive and stuff like that
4 aren't set up that way. They don't attach to
5 your phone number unless you have only like, only
6 like e-mail account with your phone number
7 attached to it like your phone number is your
8 e-mail, which I know some people use it that way
9 but it's --

10 Q. What I want you to do is find for me your
11 Google sign in, your ID and your password and
12 give them to me.

13 A. I don't think it will do any good though.
14 I won't be able to log in without administrative
15 access or two factor, my e-mail account without
16 two-factor identification. I'll have to look at
17 and see, verify user. So, it won't work that
18 way. You can't just login to it.

19 You have to use two-factor identification
20 to get into Google Drive and it also has to be
21 verified because it's also the e-mail password.

22 Q. Well, you can verify it with your phone
23 right there, right? It's two factored with your

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 phone number? They'll send a text, right?

3 A. No. It's not a text based. It's a
4 revolving application. It's not going to set up
5 on some other devices that I have.

6 Q. Well, why don't you just give me the -- I
7 could send a subpoena to Google, too, but give me
8 your e-mail or phone number associated with the
9 account and the password.

10 A. That's what I'm trying to do right now.

11 Q. Sorry?

12 A. That's what I'm trying to do right now,
13 but it's not listing my e-mail account next to
14 the -- so you'll have to give me a moment.

15 Q. Sure. Go ahead.

16 A. It's just set up. I don't use it so.

17 Q. It looks like Chet@ChetMiningCo.com is
18 your ID. So, I just need your password and it's
19 not happy.

20 A. I know it's not that one because that's
21 an enterprise e-mail. The way it's set up is
22 differently. It's not the traditional ESP of
23 apps.

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 You're going to have to give me time to
3 do this. I'm trying to log in and out with my
4 e-mail and it's not working so.

5 Q. Well, don't you have the password saved
6 on your phone?

7 A. It's not.

8 Q. Well, you just logged in today, this
9 Google Drive, right?

10 A. I was already logged in to it.

11 Q. Yeah. Okay.

12 A. It was already on the laptop so.

13 Q. So, have you found your ID yet or
14 anything? What's your ID for Google Drive?

15 A. I had to log myself out so. Yeah. I
16 definitely locked myself out. I have to create a
17 new password. Hold on.

18 Q. Are you waiting for something, Chet?
19 What are you doing?

20 A. I locked myself out. So, I'm trying to
21 get back in and it's taking a bit of --

22 Q. Okay. So, when you log yourself back in
23 what ID did you use?

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 A. That's what I'm trying to do right now.
3 I'm trying to use my WWPV2013.

4 Q. Can you spell that for Sue?

5 A. It's WWPV2013@Gmail.com.

6 Q. Any progress, Chet?

7 A. I'm trying everything but it's not easy.

8 Q. Well, what's your Gmail account e-mail?

9 A. That's what I just gave you.

10 Q. Can you answer questions while you are
11 working on that still?

12 A. Absolutely.

13 Q. Let's proceed. I want you to still work
14 on resetting your password. You don't have to
15 reset your ID. You just have to reset your
16 password, right?

17 A. I really hope I don't need to reset my
18 ID. That will be a real problem.

19 Q. No. You don't have reset your ID. You
20 just have to reset your password. So, what is
21 your ID that you are using in an attempt to reset
22 your password?

23 A. WWPV2013.

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 Q. Okay. P as in Peter, B as in Boy?

3 A. Victor. William, William, Paul, Victor
4 2013@Gmail.

5 Q. Okay. Is that your only Gmail e-mail?

6 A. It's the only active one.

7 Q. Okay. All right. You keep working on
8 that. I'm going to ask you some questions about
9 the claims that my clients brought in this case.
10 Okay?

11 So, I'm going to focus your attention on
12 the allegations that were made against you in
13 Alex Holmes versus Chet Mining Co., LLC, et al.
14 Southern District of New York, Index No.
15 20-CV-04448. Okay?

16 You've defaulted in that action. Are you
17 aware of that?

18 Chet, can you hear me?

19 A. Yeah. I said no.

20 Q. You weren't aware that you've defaulted?

21 A. I wasn't aware of that. If you are
22 saying I am.

23 Q. Okay.

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 A. I wasn't aware.

3 Q. I'm telling you now we have default
4 judgments entered against you for a substantial
5 amount of money on behalf of Alex Holmes, Josh
6 Navarro, Nico Tramontana, I probably got that
7 name wrong, but you know Nico, Bitcoin Ventures
8 2020, LLC, Yasar Corporation and OnePurpose, LTD.
9 Okay?

10 A. OnePurpose, LTD did you say?

11 Q. It's an entity that invested with you.
12 Do you recognize those other names though?

13 A. Some of them I do.

14 Q. Do you recognize Alex Holmes' name?

15 A. Yeah.

16 Q. Did you have some business dealings with
17 Alex Holmes?

18 A. Yeah.

19 Q. Were some of those business dealings
20 conducted over the internet and by phone?

21 A. We talked on the phone all the time.

22 Q. Did you e-mail him?

23 A. Yeah. We had e-mails.

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 Q. Okay. And did you offer to sell him
3 mining equipment?

4 A. That's what he asked --

5 Q. Is the answer yes?

6 A. That's what he asked me for.

7 Q. He asked you to sell him mining
8 equipment; is that correct?

9 A. That's correct.

10 Q. Bitcoin mining equipment or crypto mining
11 equipment?

12 A. Just all-around mining equipment.

13 Q. But not -- for crypto mining equipment,
14 right?

15 A. Well, crypto and Bitcoin. Bitcoin is a
16 part of crypto.

17 Q. Right. But we are not talking about
18 mining for gold equipment, correct?

19 A. Oh, I don't -- he never asked me to do
20 that. He may have asked but.

21 Q. And did you offer to sell him a number of
22 cryptocurrency mining computers?

23 A. He asked me for, to find someone and I

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 did.

3 Q. So, Alex Holmes asked you to find some
4 Bitcoin miners to sell to him and you attempted
5 to do that; is that correct?

6 A. That's what we did, yeah.

7 Q. And --

8 A. It wasn't just Bitcoin. It was Bitcoin
9 and other, other ASIC miners.

10 Q. Other cryptocurrency. So, we'll call it
11 cryptocurrency mining equipment. You know what I
12 mean by that; is that correct?

13 A. That's correct. That's the accurate
14 description.

15 Q. And so, for example, there's something
16 called an S9 Miner, correct?

17 A. S9 by Bitmain.

18 Q. Right. And an AntMiner L3+ miner; is
19 that correct?

20 A. Yeah. That's a Bitmain miner as well.

21 Q. Okay. And so there are a number of
22 different types of miners that you offered to
23 sell Alex Holmes; is that correct?

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 A. That he sourced through me. He came to
3 me to source them.

4 Q. And you agreed to source them?

5 A. Yes.

6 Q. And did he wire you --

7 A. We worked together on it.

8 Q. And was that transaction made over the
9 internet?

10 A. The transaction for the miners?

11 Q. Yes.

12 A. I honestly don't know what you mean by
13 that. I think all transactions are done through
14 using the internet.

15 Q. So, for example, you would communicate
16 with Mr. Holmes over the telephone and also by
17 e-mail on the internet. Is that correct?

18 A. Yeah. We communicated through e-mail and
19 text message and cell phones.

20 Q. Okay. And a lot of these are yes, no
21 questions because I'm just going to ask you some
22 pretty simple straightforward questions. Okay?

23 And you would send invoices by e-mail

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 over the internet to Mr. Holmes; is that correct?

3 A. We did structure some of them through
4 e-mail, by invoicing but it was an invoicing
5 platform that issued the e-mails.

6 Q. Did you use US Mail for any of these
7 transactions?

8 A. No. I don't believe we did. I mean,
9 it's been a couple of years so I doubt it. We
10 don't really use US Mail. I think we used FedEx
11 a couple of times to ship things, but that was
12 basically it.

13 Q. And Mr. Holmes transferred you, to you
14 certain funds via wire or by, you know, crypto-
15 currency transaction?

16 A. I'd have to look and see how he
17 transferred things over. I don't know how he
18 transferred anything over.

19 Q. Well, he didn't send you a check; did he?
20 You weren't dealing with checks; were you?

21 A. I don't believe we used checks but we may
22 have. It depends. There are a lot of stuff that
23 we sourced together and --

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 Q. Hey, Chet, let me just ask you a couple
3 pointed questions. Remember what I said at the
4 beginning that this is my deposition and I get to
5 ask you questions.

6 A. Absolutely.

7 Q. And I can ask you leading questions and
8 if you don't agree with me, you don't have to
9 agree with me.

10 But did Alex Holmes pay you money over
11 the internet for cryptocurrency mining equipment;
12 yes or no?

13 A. I don't know how to answer that in a yes
14 or no fashion because it's not that simple. It's
15 not like we did it just this way or just that way
16 or it was done through the internet. I don't
17 know what that's entailing. Honestly I think
18 everything uses the internet for transactions to
19 verify. So, it's how it's done.

20 Q. So the answer is you don't know, Chet?
21 Is that right? You don't know?

22 A. It's not how we did all of our
23 transactions.

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 Q. Well, did he ever give you cash?

3 A. We talked on the phone. I know we
4 e-mailed.

5 Q. Did he ever give you cash?

6 A. Bought stuff. Sometimes I bought stuff.

7 Q. Did he ever give you cash?

8 A. I don't believe he did. I don't know.

9 Q. Do you know if he ever gave you a check?

10 A. I don't know. He may have.

11 Q. Do you know if he ever gave you a money
12 order?

13 A. I don't think we ever used a money order.

14 Q. Okay. On May 7th, 2019, did Alex Holmes
15 wire you \$60,000?

16 A. I'd have to check. I can't --

17 Q. What would you have to check?

18 A. I'd have to check the bank records to
19 verify that date.

20 Q. Where were you receiving funds back then?

21 A. On 20- when?

22 Q. May 7th, 2019.

23 A. I think that was at Chase.

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 Q. Right. JP Morgan Chase account?

3 A. Yeah. JP Morgan Chase account.

4 Q. Would that have been account number
5 351530560?

6 A. I have to check. I think that's -- that
7 seems right, but I have to double-check the
8 account number.

9 Q. Would that have been in the name of Chet
10 Mining, LLC?

11 A. It should be under Chet Mining, LLC.

12 Q. All right.

13 A. Or Chet Mining.

14 Q. And back then did you have an address at
15 50 West Street, Suite 29A, New York, New York?

16 A. I did.

17 Q. And how much was rent there?

18 A. I don't remember.

19 Q. Was it more or less than 10,000 a month?

20 A. It was less than 10,000, I believe.

21 Q. Okay.

22 A. There's utilities.

23 Q. Did you ever use an address of

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 WWPV2025@Gmail.com?

3 A. I may have. I don't know.

4 Q. What does WWPV stand for?

5 A. It's just WWPV. It's something I've used
6 for a long time.

7 Q. What does it stand for?

8 A. WWPV.

9 Q. Okay. On May 17th, 2019, did Alex Holmes
10 wire to you or your company \$19,292.75?

11 A. I'd have to look at the banking records
12 to verify the exact amount, but I assume that's
13 what he wired if you are looking at transaction
14 records.

15 Q. On June 3rd, 2019, did Alex Holmes wire
16 you or your company \$225,000?

17 A. I would have to check to see the records.
18 I can't, again, do that without -- I'm assuming
19 if you are looking at the wire records that's
20 what it is, but I can't assume you're right.

21 Q. You have no reason to dispute the
22 records, correct?

23 A. I would have to look at the records to

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 verify any of this stuff so. If I don't have the
3 records in front of me I can't say that it
4 happened. You are talking about something that
5 happened several years ago. There's no way I
6 could possibly know that.

7 Q. So, the answer is I don't know; is that
8 right?

9 A. Essentially.

10 Q. Okay. You can just say that.

11 A. I can verify it, but I have to verify it
12 against the records.

13 Q. Well, where would you get the records?

14 A. I'd have to look at the electronic
15 statements that I shared with you and the ones
16 that I have. So, whatever I have digitally.

17 MR. HARWICK: Well, we'd request
18 again that you comply fully with the
19 subpoena that I will e-mail you again
20 today, Exhibit A, that does require you
21 to produce all banking account records
22 for the last six years for you personally
23 and for any of your companies.

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2
3 *COUNSEL REQUESTS INFORMATION TO BE SUPPLIED*
4

5 Q. Did Alex Holmes wire you an additional
6 \$10,000 or your company on June 24th, 2019?

7 A. I'd have to check the records. I don't
8 know.

9 Q. According to the allegations in the
10 complaint Alex Holmes wired you a total of
11 \$314,293.75 in May and June of 2019. Does that
12 sound about right?

13 A. I don't know until I look at the records.

14 Q. Where did that money go?

15 A. I don't know until I look at the records.
16 I don't know what to say. I don't know.

17 Q. Did you ever send him any equipment in
18 exchange for that money?

19 A. I sent him some equipment to Washington.
20 I know that. And he had a location there that I
21 sent some equipment to. The rest of the
22 equipment I think was in Canada.

23 Q. So, did you fulfill your promise to

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 Mr. Holmes in exchange for the money that he
3 wired?

4 A. I honestly -- there's no way to actually
5 say that yes or no, because his perspective and
6 my perspective are going to be totally different.

7 Q. How so?

8 A. How I feel about something is totally
9 different from what actually transpired when you
10 talk about feelings versus fact. I can only
11 speak to fact and, you know, I tried to do as
12 right by him as I would anybody else.

13 Q. Well, he essentially agreed to buy some
14 mining equipment from you. Is that correct?

15 A. Yeah. He sourced me to buy, to get
16 mining equipment and try to find deals and stuff
17 like that through mutual friends.

18 Q. And he sent you some money to do that,
19 right?

20 A. I know that he did send me some money.

21 Q. Okay.

22 A. But I just don't know how much it was.

23 Q. Okay. And you were supposed to

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 essentially procure mining equipment for
3 Mr. Holmes in exchange for that money; is that
4 correct?

5 A. That's, that's what the retail side was
6 for. Yes.

7 Q. Yes. Okay.

8 A. That's what I was supposed to do.

9 Q. Did you fulfill those obligations or not?

10 A. That's the same question you asked me
11 before. My answer won't change on that. It's a
12 matter of opinion on that.

13 Q. I'm sorry?

14 A. It's a matter of opinion on that.

15 Q. Well, did you buy equipment and transfer
16 it to --

17 A. Yes.

18 Q. -- Mr. Holmes?

19 A. I did. I did actually send some
20 equipment out to him directly. He asked me to
21 hold on to a lot of the equipment though.

22 Q. Okay. And you have records for that, to
23 support that?

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 A. That I sent out equipment to him?

3 Q. Yes.

4 A. Yeah.

5 Q. Where did you buy the equipment from?

6 A. Various sources like I said before.

7 Q. Okay. Well, why don't you name them.

8 A. There's a lot of different people that we
9 went through so it's kind of hard to go back. I
10 have to go verify exactly who was where for which
11 transaction.

12 MR. HARWICK: Well, we are going to
13 request that you supply any documentation
14 that you can --

15 THE WITNESS: Any documentation I
16 can produce I will produce and I have
17 sent over.

18 MR. HARWICK: Well, I want to put
19 something on the record again because
20 this is my deposition.

21 We are going to request that you
22 produce in response to the subpoena any
23 and all documents showing that you or

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 your companies actually purchased the
3 equipment that you had promised the
4 plaintiffs in this case instead of just
5 stealing their money and absconding with
6 it.

7
8 *COUNSEL REQUESTS INFORMATION TO BE SUPPLIED*

9
10 Q. Do you understand that's the allegation
11 in this case, that you basically took the money
12 from my clients and absconded with it and did not
13 provide them with the equipment that you had
14 promised? Do you understand that's the
15 allegation at least?

16 A. I understand that's what you are saying.

17 Q. Yeah. Do you disagree with that
18 allegation?

19 A. I disagree with it fundamentally.

20 Q. Why?

21 A. Because I did get equipment for my
22 clients.

23 Q. Okay. And so explain that to me. When

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 you got equipment for your clients how did that
3 work? Would you send the equipment to them or
4 would it be hosted at a separate facility?

5 A. It depends on the client. Sometimes the
6 client asks us to hold on to it for hosting
7 purposes. Sometimes they ask for us to get them
8 in touch with somebody, like to go ahead and
9 source it. A lot of these machines are hard to
10 get ahold of so it depends on the circumstances.

11 Q. Let's talk about Alex Holmes. Was the
12 deal that you were going to send him the
13 equipment or were you going to host it for him or
14 have a third-party host it for him or a
15 combination of the three or something else? Tell
16 me what the deal was with Mr. Holmes.

17 A. I have to review his agreements, but I do
18 know that he asked me to send stuff out directly
19 to him through third-parties and otherwise,
20 through people that he set up as well and we
21 worked together on that so.

22 Q. Hey, Chet, is it your position that you
23 fulfilled all your contractual obligations with

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 the plaintiffs in this case?

3 A. I wouldn't say -- I wouldn't -- I mean, I
4 wouldn't go down that road of as far as that goes
5 and I wouldn't go ahead and say that that's my
6 position as you say it. My position is
7 different.

8 Q. What's your position?

9 A. It's a difficult industry. I did what I
10 was asked to do and not always has it been in my
11 ability to go ahead and see that through. When
12 you are doing deals where you are working hand in
13 hand with somebody and they go ahead -- a lot of
14 times the stuff gets held up because of
15 manufacturing, sometimes the third-party --
16 there's a lot of things that can go wrong when
17 you are trying to purchase equipment. And
18 sometimes it's manufacturing delays by the
19 manufacturer. If it's third-party equipment
20 sometimes it can be burned out if you are doing
21 purchases or it can get damaged in shipping.
22 There's -- if you are buying it secondhand as
23 well or used equipment, which sometimes is the

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 only way to get equipment, they can end up being
3 defective. I mean mass manufacturing to my
4 knowledge, to the best of my understanding, is 3
5 percent of all mass manufacturing, whether you
6 are buying iPhones or whatever is defective. So,
7 there's a lot of things that can go wrong in that
8 process and because a lot of the stuff is
9 manufactured in China, a lot of people found
10 themselves in difficult positions as far as
11 getting them to pull warranties and the contracts
12 and a lot of that stuff --

13 Q. Okay. So you are telling me that you
14 took, for example, Alex's money and you may have
15 had some problems with your suppliers? Is that
16 fair to say?

17 A. No. That's not what I'm saying right
18 now. What I'm saying is exactly what I'm saying.
19 What I'm saying is that the industry is such that
20 where you run into certain suppliers that aren't
21 great sometimes. Sometimes you run into an
22 effortless supplier that gives you a really fair
23 deal. But you definitely run into, regardless of

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 who you are, you run into issues purchasing
3 equipment at some point in time, whether it's
4 delays in exports, some are over in Asia, so you
5 have stuff that can get tied up in customs and
6 there's regulatory bodies that are outside of
7 your control that you have to just go ahead and
8 wait with. And that's the challenge with a lot
9 of this industry. So, you try to, you know, you
10 try to do your best within the current
11 environment.

12 Q. What did you use Alex Holmes' money for?

13 A. To buy equipment, what he asked me to do.

14 Q. Okay. You used all of his money to
15 buy --

16 A. Buy equipment, pay for hosting.

17 Q. Hold on. I got a question for you. And
18 it's a yes or a no question. You can answer it
19 either way. I don't really care.

20 Did you use all of Alex Holmes' money to
21 either buy equipment or pay for hosting?

22 A. I can't speak to that. We had employees
23 as well. We have operating costs.

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 Q. How much of that money was profit?

3 A. I can't speak to that. I don't --

4 Q. Who were your employees in 2019?

5 A. I'd have to pull up a list of the people
6 that we had on as independent contractors.

7 Q. What would we call that list?

8 A. I'd have to pull up a list of people that
9 were independent contractors and I'd have to go
10 through and see who was an independent contractor
11 for us.

12 Q. Where is that list stored? You've got to
13 speak up.

14 A. I don't think anyone was fully in 2019.

15 Q. Where is that list kept? Is that on the
16 cloud, is that on a hard drive, is it somewhere
17 else?

18 A. I have to check my hard drive. I have
19 most of my stuff on an external hard drive right
20 now.

21 Q. Where's your external hard drive?

22 A. I honestly don't know. It may be down in
23 the car.

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 Q. It may be down where?

3 A. It may be down in my car. In my backpack
4 in the car. I don't know where it is right now.

5 Q. What kind of car do you have?

6 A. I have a rental car right now. I think
7 it's like a Kia or something.

8 Q. So you think your hard drive is in your
9 backpack in your car?

10 A. Yeah.

11 Q. Okay. Why don't we take a short break
12 and you can go get it. Okay?

13 A. All right.

14 Q. So why don't we take a fifteen -- how
15 long will it take you to get down? What floor
16 are you on, by the way?

17 A. I'm on the 20th floor.

18 Q. Is there a doorman or someone in the
19 building?

20 A. There's a doorman in the building, yeah.
21 I mean, they don't really do anything besides
22 hand you packages but.

23 Q. Yeah. Why don't you go down and get your

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 hard drive and then come back on and we'll stay
3 on the record. Okay?

4 A. Okay. That may take me some time to find
5 my hard drive quick.

6 Q. Okay. It might be in your car you think?

7 A. I think it's in my car. I don't know. I
8 mean, I have to go find it.

9 Q. You know we subpoenaed your hard drive
10 for today, correct?

11 A. My hard drive?

12 Q. Yeah.

13 A. I had no idea that you subpoenaed my hard
14 drive today.

15 Q. Yup. So, why don't you run down and get
16 it and come back when you are --

17 A. You have a subpoena for the hard drive?

18 Q. Yeah.

19 A. Can you e-mail it over to me, please?

20 Q. Yup. We served you with a subpoena.

21 That's why you are here today. We had a process
22 server serve you and then I separately e-mailed
23 you.

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 So, go down and get your hard drive and
3 come on back up. Okay?

4 A. Okay. Yeah. Just if you could forward
5 that over to me I'd appreciate it.

6 Q. You already have it, Chet. I'm not going
7 to send it again.

8 Go down and get your hard drive and come
9 on back up. Okay? We'll wait. Why don't we
10 reconvene at 3:20. Okay?

11 A. What time is it now?

12 Q. 3:00.

13 A. All right. It might take me a little
14 time to find my hard drive, but I'll try to find
15 it real quick.

16 Q. We'll be standing by. Okay?

17 A. I'll be here at 3:20 though.

18 Q. All right. Good.

19 (Recess taken at 3:00; proceedings
20 resumed at 3:25 p.m.)

21 MR. HARWICK: Back on the record.

22 Q. So, you went down to your car?

23 A. Yeah. I went down to the rental. I

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 don't know if I have the drive or not but.

3 Q. Did you find the hard drive?

4 A. I don't know if I have it or not. I just
5 grabbed my bag.

6 Q. Why don't you open your bag and let us
7 know.

8 Are you looking in your bag?

9 A. Yeah.

10 Q. All right. Do you see your hard drive?

11 A. I'm looking for it.

12 Q. Well, in any event, you have a hard drive
13 with some information on there, correct?

14 A. It's a hard drive. I keep my backup
15 documents on.

16 Q. Okay. And there's some information about
17 some of the contractors that you use, some of
18 your vendors and possibly some information about
19 the transactions that you had with the plaintiffs
20 in this case. Is that fair to say?

21 A. No.

22 Q. I'm sorry. Did you say yes?

23 A. No.

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 Q. I'm sorry. What did you say?

3 A. No.

4 Q. Okay.

5 A. If you add all those things together, no.

6 But if you simply put that there's my backup
7 documents on there, yeah. That's where I keep my
8 backup documents. I can't tell you what's on
9 there until I get into the drive.

10 Q. Well, we are going to request that you
11 make a copy of the hard drive and we're also
12 going to reserve the right to --

13 A. Okay. I can send you over a copy of
14 that. That's not the issue, but I have to find
15 it first.

16 MR. HARWICK: Okay. So, for the
17 record, you are agreeing to provide us
18 with a full, complete and accurate copy
19 of the information on your hard drive
20 that you are going to locate. Is that
21 correct?

22 THE WITNESS: If I can locate it,
23 yeah.

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2
3 *COUNSEL REQUESTS INFORMATION TO BE SUPPLIED*
4

5 Q. So, going back to Alex Holmes. Was part
6 of your deal with Alex that you were going to
7 host some of these crypto miners for him and send
8 him the profits from hosting the miners, is that,
9 was that part of the deal?

10 A. Hosting is something that we do
11 complimentary sometimes with sales. It depends
12 on what the deal is, but we don't handle the
13 profits directly.

14 Q. Was part of the scheme that you were
15 engaged in telling your customers that they were
16 making money on these Bitcoin mining machines --

17 A. No.

18 Q. -- when, in fact, they weren't and you
19 were just trying to get more money out of them
20 for your own --

21 A. No.

22 Q. No?

23 A. No, to that sentence after the first

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 word.

3 Q. Did you steal their money?

4 A. No. I didn't take anyone's money from
5 them. I didn't force them to send me money when
6 they were purchasing stuff.

7 Q. Did you use any of the money that Alex
8 Holmes sent to you for your own personal use?

9 A. I can't really speak to that because I
10 don't know what that would have entailed. The --

11 Q. All right. Is it true that in addition
12 to the \$314,000 that Alex Holmes wired to you in
13 May and June of 2019 that he wired an additional
14 \$182,798.96 to you after you had represented to
15 him that his miners that you allegedly purchased
16 for him were making a profit?

17 A. I don't know how to answer that question.
18 You asked me four different questions in the same
19 sentence.

20 Q. All right. Well, let's break it down.

21 After you entered into a transaction with
22 Alex Holmes to provide him with miners or source
23 them as you would say did he wire you additional

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 funds in July of 2019 based on the --

3 A. I'm unclear still. Sourcing is different
4 from providing, as you would say, and sources is
5 when you work together to buy something or you
6 find something independently and it can be used
7 both in context with -- the context is incorrect.

8 Q. So, let me use your term source. Okay?
9 We'll use your term source.

10 A. Buy the equipment -- whether you do it
11 together or you do it apart it's when you find
12 the equipment, you source the equipment, and then
13 you do a transaction and decide whether to keep
14 that equipment or not depending on what the price
15 range was.

16 Q. So, what was your deal with Alex Holmes,
17 did you source it or find it or sell it to him?

18 A. That's what I was saying. With Alex I
19 have to review each one of the transactions to
20 say for sure.

21 Q. Well, what documents would you have to
22 review and where are those documents?

23 A. Well, I would have to see, I would have

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 to look through the bank transactions first to
3 verify that those amounts are correct and those
4 are the ones that I provided to you already. And
5 I can't speak without seeing those bank documents
6 like I said before. I can't say, ascertain
7 that -- I can't say that for sure because I don't
8 know the exact dollar figures. It was three
9 years ago. If I go through the bank
10 statements --

11 Q. Chet, I'm going to stop you again. This
12 is my deposition and I get to ask you questions
13 and you are rambling a little bit.

14 I want to know do you recall what the
15 agreement you had was with Alex Holmes. Was it
16 to sell him miners, was it to be in a partnership
17 where you would both purchase miners, was it to
18 broker the sale of miners, what was -- or you
19 don't know or you don't remember? But what do
20 you remember the agreement was that you and your
21 company had with Alex Holmes?

22 A. Well, the agreement wasn't written in a
23 contract that we had together. So, it wasn't set

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 one way or another.

3 Q. Tell me your understanding of the
4 agreement that you and your company had with Alex
5 Holmes.

6 A. It depended on each one of the
7 circumstances. We didn't have a written contract
8 in place for how we conducted each one of our
9 deals or each one of our transactions. So, it's
10 not like we had a set in stone way of doing
11 things. It was basically, primarily at his
12 leisure how he want to do it, come to me to do
13 something.

14 Q. Did you ever send any money back to Alex
15 Holmes after he wired you --

16 A. What was that?

17 Q. Did you ever send any money or Bitcoin
18 back to Alex Holmes after he had wired you close
19 to half a million dollars?

20 A. I'm sure that I've sent him Bitcoins in
21 the past.

22 Q. By the way, Chet, have you been contacted
23 by the FBI yet?

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 A. No. Never.

3 Q. Have you talked to an agent name Blair
4 Deal, who's investigating you?

5 A. Never heard of him.

6 Q. Do you know if you are under criminal
7 investigation?

8 A. No. I have no -- just hearsay.

9 Q. What hearsay have you heard?

10 A. Just what you've told me.

11 Q. Oh, okay. And you haven't been contacted
12 by any type of law enforcement yet regarding
13 these transactions?

14 A. Never.

15 Q. Okay. All right. You know the
16 allegations in this case is essentially that you
17 stole money from the plaintiffs using the rouse
18 of selling them Bitcoin mining equipment as a
19 scam. Do you understand that's the allegation in
20 this case?

21 A. I didn't understand that as that's what
22 it was. What I understood was this was a dispute
23 on purchases.

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 Q. Dispute on purchases that your company
3 agreed to sell the plaintiffs, correct?

4 A. No. Just a dispute on purchases in
5 general but that's what the setup was supposed to
6 be so.

7 Q. It's my understanding from the review of
8 the documents and transactions in this case that
9 essentially your company and you agreed to sell
10 some equipment to the plaintiffs, they paid you
11 the money, and they never got anything in return.
12 Do you dispute that?

13 A. I -- I don't know how else to say this,
14 but you are saying a bunch of different things at
15 once and I can't answer one without the other
16 because they are all leading into something else.

17 Q. I'm allowed to ask you leading questions.
18 You don't have to agree with me. But I'm telling
19 you that the allegations in this case against you
20 are that you engaged in quasi criminal conduct by
21 taking the plaintiffs' money and not giving them
22 anything in return. Do you dispute that?

23 A. I would say that's inaccurate.

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 Q. Okay.

3 A. I would say it's inaccurate. I wouldn't
4 say that they -- to say that they got nothing in
5 return would be obviously wrong.

6 Q. What did Alex Holmes get in return for
7 his nearly half a million dollars that he sent to
8 you via wire and --

9 A. It depends on -- I'd have to go through
10 the transactions like I said before. I have to
11 go through each one of the transactions to tell
12 you what that is.

13 Q. And so what would you have to look at,
14 the bank account statements? Have you done that
15 before today?

16 Have you done that before today, Chet?
17 You knew you were giving a deposition today.
18 Right?

19 A. Yes. I didn't hear what you said before
20 that.

21 Q. Oh, I'm sorry. How long would it take
22 you to go through those records and give us, you
23 know, your impression of what happened on each

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 one of these transactions?

3 A. I would have to go through each one,
4 probably talk to Alex a little bit, too, just to
5 confirm each one of the transactions and go from
6 there, because Alex and I worked hand-in-hand on
7 this so it was.

8 Q. Well, we talked about Alex. And
9 understand the other plaintiffs in this case have
10 similar allegations against you and have signed
11 sworn statements in federal court attesting to
12 the fraud that you perpetrated against them.

13 Have you seen those affidavits?

14 A. I haven't.

15 Q. Okay. Do you think all the plaintiffs
16 are lying?

17 A. I wouldn't call the plaintiffs liars no
18 more than I would call Alex or you a liar. I
19 think it's rude to do. But, you know, the bottom
20 line is, is that I can't really -- I can't really
21 get into that without, you know, stepping on
22 someone's toes or going into a direct
23 confrontation standpoint about it but to say my

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 intent was never to disrespect my clients and I'm
3 not going to do that now, but at the same time,
4 you know, there was a lot that I had done and
5 there's a lot of material that I had presented
6 forward, which Alex is aware of and some of your
7 other clients are aware of, too, where they are
8 able to see some of the stuff themselves so.

9 Q. But if you wanted to, you could go
10 through your own banking records and your own
11 personal records, by the way, which I've
12 subpoenaed and haven't been produced, and you
13 could show to me what my clients got in exchange
14 for sending you wire funds and Bitcoin? Is that
15 fair to say? Can you support your position with
16 records do you think?

17 A. What position are you referring to?

18 Q. Your position that you didn't defraud my
19 clients.

20 A. Of course that's my position, but the
21 bottom line is what someone will see or what will
22 see in a court is totally different from what I
23 can go ahead and materially put together. It's

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 been three years since that date. So, it's a bit
3 difficult to pull certain records, especially --

4 Q. What I'm going to do is I'm going to
5 adjourn this deposition one more time and give
6 you an opportunity to collect any and all records
7 that you can send to me in advance of the next
8 deposition where you can show evidence that you
9 did not defraud my client by committing a
10 criminal act involving the use of the internet,
11 telephone, texting. And I also want you to
12 produce a complete copy of your hard drive by the
13 next deposition. And I want to, before we
14 adjourn for today's deposition, I want to go back
15 and have you log in to your Google account and
16 share access to your cloud with your reset
17 password and let me know what the reset password
18 is. And you can stand by for the two-factor
19 authentication, if needed. Okay?

20
21 ***COUNSEL REQUESTS INFORMATION TO BE SUPPLIED***

22
23 Q. So, why don't we --

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 A. I haven't been able to reset or get back
3 in yet. So, I can go ahead and try to contact
4 Google and get through that, but I have to --

5 Q. Chet, you understand you are under oath,
6 right?

7 A. I know, but I have to go through the
8 troubleshooting steps, when you are locked out of
9 the account it's hugely on you. So, that's my
10 mistake.

11 Q. I just want to make a record here, Chet.
12 Okay. This is a federal court deposition. You
13 are under oath. Okay?

14 A. Yes.

15 Q. And you are under the penalties of
16 perjury, okay?

17 A. Yes.

18 Q. Which are criminal sanctions, civil
19 sanctions, we can bring you in front of the
20 federal court judge or the state court judge. Is
21 it your testimony under oath today that you are
22 not able to reset your Google password to log in?

23 A. No. I just haven't got through yet. I

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 know I can reset my password. It's going to take
3 some time to do.

4 Q. Okay. We'll take a break and we'll come
5 back in 20 minutes and see if you can do that in
6 20 minutes. I'll ask you to --

7 A. That's what I'm saying. It takes a
8 little bit of time. We've been going over a
9 couple of other things. I had to go downstairs.
10 I wasn't in front of my computer. It's not, not
11 willing to complying with the information that
12 you need. It's --

13 Q. That's fine. Go ahead. We'll take
14 another break and we will try this one more time
15 before we, you know, have to contact the court.
16 Okay?

17 A. Okay.

18 (Recess taken at 3:45 p.m.;
19 proceedings resumed at 4:00 p.m.)

20 Q. Chet, we are back on the record and you
21 are going to try to get us in to your Google
22 cloud account. While you are doing that, what's
23 Light Asset Management, LLC?

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 A. It was a company that we opened a while
3 back and did a closing shortly thereafter. It
4 was just an old company we ended up closing out.

5 Q. Do you have any dealings with Mr. Paul
6 Wu, W-u?

7 A. Not with Light Asset Management.

8 Q. With anything else?

9 A. No. We are friends, but right now we are
10 not doing anything else.

11 Q. What's his address?

12 A. I don't have his address. I'm sorry.
13 I'd have to go ahead and give him a call and ask
14 him what it is.

15 Q. Okay. What's his phone number? I'll
16 call.

17 A. Can we do this first, the password and
18 everything else?

19 Q. Go ahead.

20 A. Yeah. It's a lot for me to juggle.

21 Q. Hey, Chet, do you own any miners?

22 A. I had a few, but they are kind of busted
23 out right now.

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 Give me just a moment. Okay? There we
3 go. All right.

4 Q. Chet, how are we doing?

5 A. All right so far, but I'm trying to --
6 security issue. I should be able to work around
7 it.

8 Q. Well, while you are working on that I
9 don't want to keep the court reporter waiting her
10 all day.

11 A. I understand that.

12 Q. Have you moved machines to Data Center
13 Hawk?

14 A. I have no idea what that means.

15 Q. Have you ever heard of Data Center Hawk?

16 A. I don't know what Data Center Hawk is.

17 Q. Had you ever moved machines to the State
18 of Virginia?

19 A. I've tried to.

20 Q. Okay.

21 A. Didn't go over very well. I told you
22 that at the beginning of the call.

23 Q. What town in Virginia did you try to move

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 machines to?

3 A. I think it was Manassas, I believe.

4 Q. All right. And do you remember the name
5 of the facility down in Manassas that you tried
6 to move machines to?

7 A. I don't.

8 Q. When did that happen?

9 A. This was last year at the start of the
10 year.

11 Q. 2020?

12 A. Yeah.

13 Q. And whose machines were you moving?

14 A. I was trying to get client machines up
15 and running.

16 Q. Do you have other clients? Who are your
17 other clients?

18 A. Like Alexes and stuff like that, that's
19 what I was referring to.

20 Q. Oh, okay.

21 A. Yeah.

22 Q. And did you ever enter into any type of
23 hosting agreement or leases with the facility in

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 Manassas, Virginia?

3 A. We didn't get to that point. There was
4 an issue with them. They were just very
5 difficult to deal with. We basically tried to
6 move in and it didn't work the way it was
7 supposed to.

8 Q. Do you own any interest in mining hosting
9 facilities or do you have any leases at mining
10 hosting facilities or hosting agreements?

11 A. I don't have any interest in real estate
12 like I told you before.

13 Q. Well, not real estate, but just the
14 facility itself, or any interest in mining
15 hosting operations or leases for hosting or --

16 A. I don't have any leases. I don't have
17 any leases to speak of.

18 Q. Are you a party to any hosting
19 agreements?

20 A. Just the ones that are outstanding that
21 haven't been executed.

22 Q. What ones are outstanding?

23 A. The stuff with Great North Data.

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 Q. Where's that?

3 A. That was Canada. We talked about that
4 earlier in the conversation.

5 Q. Who's Shamim Ahmed? S-h-a-m-i-m A-h-m-e-d?

6 A. He's a -- somebody that wanted to do
7 business and in the crypto-verse and just kind of
8 didn't really pan out.

9 Q. Was he your lawyer at any point in time?

10 A. I wouldn't say he was my lawyer. He is a
11 lawyer but.

12 Q. All right. I'm going to give you notice
13 that I'm going to subpoena Paul Wu and Shamim
14 Ahmed as well for a collection deposition.

15 Can you give me Paul Wu's number from
16 your --

17 A. I have a password for you I think.

18 Q. Oh, great. Go ahead.

19 A. It's HappyDog with the H and D
20 capitalized.

21 Q. Is that it?

22 A. 01. Or HappyDog1! I think is what it
23 ended up having to be when I reset it. 01.

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 Sorry. 01! So, H and D capitalized 01!.

3 Q. And we are using WWPV2013 Gmail account?

4 A. Yeah. I'll have to reconnect it to the
5 Drive now.

6 Q. So, I just sent you a verification code.

7 A. I'm not in yet. So you'll have to give
8 me a minute.

9 Q. Is your cell phone on, Chet?

10 A. No.

11 Q. You can turn it on for me. You've got to
12 turn your phone on so they can send.

13 A. Doing that right now. Sorry. I've got a
14 security alert again.

15 Q. You'll have to log out so I can log in I
16 think, you know.

17 A. I was logging in when you --

18 Q. Are you logged out, Chet?

19 A. I'm trying to right now. You'll have to
20 attempt to log in again.

21 Q. No. I don't want you to log in. I want
22 to log in for you.

23 A. That's what I'm saying.

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 Q. Me? You want me to try to log in?

3 A. Yeah. Try. If you can.

4 Q. Okay.

5 A. I have a bad internet connection. Let's
6 see if we can get you logged into the Google
7 Drive.

8 Q. Is your phone on?

9 A. My phone is booting up right now. So, go
10 ahead and try to log in.

11 Q. I got to call your phone to send you the
12 security code.

13 A. What's the security code?

14 Q. It's going to be sent to your phone once
15 you boot your phone up.

16 A. Go ahead and log in. I don't think
17 that's how it's set up.

18 Q. All right. Turn your ringer on so we can
19 hear it.

20 A. I didn't get anything on my end. Let me
21 just pull it up on my computer.

22 Q. It's got to -- it wants to text you.

23 A. I still get my text messages here. All

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 right. G127 --

3 Q. Hold on. T as in Tom?

4 A. T127925.

5 Q. Hold on for a second, Chet. T as in Tom
6 or P as in Peter?

7 A. T as in Tom. No. G. It starts with a
8 G. Every one starts with a G. The numeric
9 afterwards is 127925.

10 Q. Right. So, mine has a G in front of it
11 and then it says 127925?

12 A. Yeah.

13 Q. 127925?

14 A. Yeah.

15 Q. Just so you know your recovery e-mail is
16 Chet@ChetMiningCo.com and the recovery phone
17 number is 310-824-3903.

18 A. Yeah. Which I have to go now and re-pair
19 it with the Drive. So, are you logged into the
20 Drive?

21 Q. Yeah.

22 A. All right. So, I have to re-pair it with
23 the Drive for the files to go ahead and connect.

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 So, I have to reset the whole -- let's see.

3 Q. Where's your Mastercard that ends in
4 88 -- 1881, by the way?

5 A. That's a Capital One account.

6 Q. That's the Capital One. For the record,
7 I'm in your Google Drive account with that log in
8 password and I don't see anything.

9 A. Yeah. The Google Drive has been
10 disconnected from its terminal, is what it says
11 here. So, I need to get it reconnected to the
12 terminal. I tried to log in earlier and it said
13 that it disconnected.

14 Q. If you had to get \$100,000 if your life
15 depended on it, how would you get that money?

16 A. What do you mean?

17 Q. Where's your assets? Where's your money?

18 A. If my life depended on it?

19 Q. Yeah. Where's your money?

20 A. The bank.

21 Q. Okay. Your bank account the last I saw
22 had a couple thousand dollars in it. Where's the
23 rest of your money?

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 A. It's -- the rest of my money is, it
3 depends. It depends on what's coming in. I
4 mean, it hasn't been like a real great quarter,
5 if that's what you are asking.

6 Q. Well, who brings you money on a regular
7 basis. Do you have any outstanding debts that
8 are owed to you or your companies?

9 A. We've already been over that. No. We
10 don't. The only thing we have that's outstanding
11 is from -- what is it -- Great North Data and
12 that's what we are trying to work out right now.

13 Q. And so is it your testimony, Chet, that
14 you only have a few thousand dollars in liquid
15 assets, including cryptocurrency, is that your
16 testimony today under oath?

17 A. No. That's not what I'm saying. It's
18 not that simple. I, as I said before, it depends
19 on, it depends on if you are asking two questions
20 or you are asking a leading question it's going
21 to be complicated for me to answer that
22 effectively.

23 Q. Here's a non-leading question. Okay? I

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 want you to describe for me under oath the
3 location and amount of your assets.

4 A. Simply put that's what I keep in my bank
5 account. When things -- when I get revenue in or
6 money from any company I put it in any back
7 account. My bank account rises and falls based
8 on what bills are. It's no different than anyone
9 else's banking.

10 Q. What's your net worth?

11 A. I don't know.

12 Q. Is it less than 100,000 or more than
13 100,000?

14 A. I don't know. I really don't know.

15 Q. How do you not know your net worth?

16 A. I don't think of things like that.

17 Q. What bank account did you use before you
18 opened the Capital One account a few months ago?

19 A. I was using TD Ameritrade and I closed
20 that account out. But TD Ameritrade I haven't
21 been able to get my statements from them. I
22 requested them, but I can't get my statements.

23 Q. Did you ever have an account at Charles

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 Schwab?

3 A. Yeah. I was at Charles Schwab before
4 that. Charles Schwab is the bank I was at
5 before.

6 Q. How much money did you have in your TD
7 Ameritrade?

8 A. It's the same bank now so.

9 Q. Okay. How much did you have in --

10 A. And Charles Schwab.

11 Q. How much did you have in that account
12 when you closed it out?

13 A. I don't know. I have to look.

14 Q. What would you have to look at?

15 A. I'd have to look at what my closing
16 balance was. I don't know what my balance was.

17 Q. We've also subpoenaed your brokerage
18 account statements. You have access to those
19 online, correct?

20 A. No. That's not correct. I don't have an
21 online log in over at Charles Schwab.

22 Q. All right. Well, we're going to ask that
23 you produce the TD Ameritrade, Charles Schwab

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 brokerage account records, produce the data on
3 the hard drive, produce the data on your Google
4 cloud account. We are reserving the right to
5 send a forensic computer engineer down to take a
6 look at the hard drive if need be and your phone
7 and your laptop. So, I'm asking you to preserve
8 those documents electronically, that equipment.
9 You are under subpoena still.

10 We are going to adjourn this deposition
11 until a later date. And I'm going to ask you to
12 prepare for the next deposition by going through
13 the documents that you've referenced today where
14 you can better explain --

15 A. I'm going to have to get these documents,
16 retrieve from the bank.

17 Q. Hold on. I was still talking.

18 A. Okay.

19 Q. To better explain as you indicate you can
20 the transactions with the various plaintiffs in
21 this case. And as I told you I've given you
22 notice that we are going to be subpoenaing your
23 family members, too. So you may want to give

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 them a heads up as to a process server coming to
3 their door with papers. Same thing with your
4 former business associates. We are going to be
5 subpoenaing them. I will provide you with
6 courtesy copies of those subpoenas and you might
7 want to talk to your family members or business
8 associates about accepting service so I don't
9 have to send a process server or the local
10 constable or sheriff to serve them. Okay?

11 A. All right.

12 Q. But I'll do the subpoenas. I'll
13 follow-up with a letter indicating you are still
14 under subpoena. We're going to pick a new date,
15 30 days out. I'll give you a little more time to
16 compile the information to comply with the
17 subpoena, because it's our position you haven't
18 fully complied with the subpoena that has been
19 served on you. And I will mail you another copy
20 of that and I will e-mail you another copy of
21 that, but I do believe you have it, Chet.

22 A. Can you send it over? Because it wasn't
23 enough time for any counselor to go through

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 everything to get up to speed. So, that was one
3 of the difficulties we ran into. Any of the
4 counsel that I tried to engage didn't have enough
5 time to review the documentation to get up to
6 speed. So, if you can send that over that would
7 be really helpful so I can go ahead and have a
8 counselor review it properly and we can acquire
9 whatever documentation you say is missing.

10 Q. Certainly if you want to hire an
11 attorney, I told you all along you have the right
12 to do that. And, again, if you want to --

13 A. Well, that's why there was no attorney
14 today is because they didn't have enough time
15 to --

16 Q. Well, that's not true at all. At the
17 last deposition I adjourned it because you didn't
18 have an attorney and you haven't had an attorney
19 because the last attorney you had quit twice
20 because of nonpayment. So, I take issue with
21 that. The last deposition we had we adjourned it
22 to give you one final --

23 A. That's not -- that's what they told me.

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 I'm not just saying that. They are saying
3 that --

4 Q. If you want the opportunity to have an
5 attorney present, certainly you are entitled to
6 do that. You know, you do have the right to take
7 the Fifth Amendment at any of these depositions
8 because there are criminal charges I think being
9 investigated and quite --

10 A. I haven't seen that yet, so I really
11 would like to have that really cleared up.

12 Q. Yeah. Yeah. I can give you the agent's
13 number and contact information, if you want that,
14 and you can clear it up with him. I'm sure he'd
15 be happy to take a statement from you.

16 A. Yeah.

17 Q. So, right now we are going to adjourn
18 this to -- sounds like you are not that busy
19 these days, huh?

20 A. No. I'm trying to stay busy but it's
21 difficult, you know. Last year was a difficult
22 year and it's really kind of this year quite the
23 same. My health has really been --

1 **[CHET STOJANOVICH - By Mr. Harwick]**

2 MR. HARWICK: We're going to
3 adjourn this to Wednesday, July 28th, at
4 10 a.m. I'm going to ask you to try to
5 get your camera working by then or do it
6 by phone.

7 Sue, can you send out a Zoom link
8 to everybody for that date, please, and
9 copy Deanna?

10 And we'll diary that for your
11 continued deposition. You are still
12 under subpoena. And I don't have
13 anything further for you today but,
14 again, this deposition is not closed and
15 we are going to continue on and get to
16 the bottom of this. Okay? So, with that
17 thank you, I'm logging off. Thanks, Sue.

18 (Whereupon, the testimony of CHET
19 STOJANOVICH adjourned at 4:26 p.m.)
20
21
22
23

1
2
3 STATE OF NEW YORK

4 COUNTY OF _____
5
6

7 I have read the foregoing record of my
8 testimony taken at the time and place noted in the
9 heading hereof, and I do hereby acknowledge it to
10 be a true and correct transcript of same.
11
12
13

14 _____
15 CHET STOJANOVICH
16
17

18 Sworn to before me this

19 _____ day of _____, 20__.
20 _____

21 NOTARY PUBLIC
22
23

DEPOSITION TRANSCRIPT ERRATA SHEET
ERRATA SHEET FOR TRANSCRIPT OF:
CHET STOJANOVICH - June 23, 2021

CORRECTION

Susan Florio, RPR - Professional Reporting Service - (518)887-2733

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I, SUSAN FLORIO, Registered Professional Reporter and Notary Public in and for the State of New York, do hereby certify that the foregoing is a true, complete and accurate transcript to the best of my knowledge, skill and ability on the date and place hereinbefore set forth.

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